THE LAW OFFICES OF

NEAL BRICKMAN, P.C.

420 LEXINGTON AVENUE, SUITE 2440 NEW YORK, NEW YORK 10170

NEAL BRICKMAN JUDITH L. GOLDSBOROUGH ETHAN Y. LEONARD VIRIGNIA A. REILLY JASON A. STEWART

The action is stayed until July 6, 2020. The parties should provide a status report prior to that date. SO ORDERED.

/s/ John G. Koeltl New York, NY John G. Koeltl May 29, 2020

TELEPHONE: (212) 986-6840

TELECOPIER: (212) 986-7691

Via ECF

Hon. John G. Koeltl **United States District Court** Southern District of New York 500 Pearl Street New York, New York 10007

May 28, 2020

U.S.D.J.

Re: Fong M.D. v. Weill Cornell Medical College et al. Civ. No. 19-CV-08416 (JGK) Joint Status Letter & Motion to Continue Stay

Dear Judge Koeltl:

We write to the Court to provide a joint status update on this matter and to make a second request to stay this proceeding. All parties consent to this request for a stay. As reported to the Court on April 7, 2020, the parties have reached a settlement of this matter, but have been delayed in exchanging a settlement agreement, in part due to the impact of the health crisis brought on by COVID-19 on the defendants Weill Cornell Medical College and NY Presbyterian Hospital and their respective counsel.

Under normal circumstances, we would have expected a settlement agreement to have been exchanged and that this correspondence would be advising the Court of the resolution of this matter, however, given both our client and the defendants continuing role in battling the national health crisis and the impact of the crisis on the attorneys involved this case, we have still not been able to fully effectuate our settlement in the timeframe that would usually be expected. We therefore write the Court to provide this update and to request a stay of the litigation while the parties finalize the settlement of this matter. We have and continue to request a settlement agreement from the Defendants, and we shall further update the Court upon finalizing the resolution of this matter. Thank you for your attention to this matter.

Very Truly Yours,

/s/ Jason A. Stewart Jason A. Stewart (JS4602) Neal Brickman (NB0874)

cc:

Benjamin Eldridge Stockman, Esq.
Brian Clark, Esq.

VENABLE LLP

Attorneys for Defendants Weill Cornell

Medical College and Hugh C. Hemmings, Jr. M.D.
1270 Avenue of Americas

New York, New York 10020

(via ECF)

John Houston Pope, Esq.

EPSTEIN BECKER & GREEN

Attorneys for Defendant New York Presbyterian Hospital
875 Third Avenue
New York, New York 10022

(via ECF)